

Koch, Kristine

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Wednesday, April 09, 2014 4:34 PM
To: Koch, Kristine; Sheldrake, Sean
Cc: GAINER Tom; PARRETT Kevin
Subject: FW: DEQ comments on draft PTW determination

Kristine and Sean,

I know you are under a tight timeframe and wanted to get you initial comments on incorporating a weight-of-evidence approach for high concentration PTW:

- 1) Determination of high concentration PTW should include a weight-of-evidence approach based on magnitude of exceedance, aerial extent of exceedance, corroborating nearby or co-located samples and other relevant information that would help determine whether or not the sample is an outlier. For example, one isolated sample that slightly exceeds the high concentration PTW threshold should not necessarily result in a PTW, just as a single bleb in a sediment core would not necessarily constitute a NAPL-based PTW. Using this approach the high concentration PTW at the upriver end of the McCormick & Baxter sediment would screen out. Other areas should be reevaluated as well.
- 2) Table 2 should include a summary of areas that exceed the highly concentrated PTW thresholds and present lines of evidence supporting or refuting the high concentration PTW determination as identified in the previous comment.

As I noted earlier, Tom will be in tomorrow and will provide a complete set of comments.

Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Ave., Suite 400
Portland, Oregon 97201-4987
Phone 503-229-5538
Fax 503-229-6945